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**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA (LAS VEGAS)**

JEANNE LLERA and JORGE L.  
GOMEZ, as the appointed co-special  
administrators of the estate of JORGE A.  
GOMEZ; JEANNE LLERA; and JORGE  
L. GOMEZ,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT; RYAN  
FRYMAN; DAN EMERTON;  
VERNON FERGUSON; ANDREW  
LOCHER; and DOES 1-10, inclusive,

Defendants.

Case No. 2:20-cv-01589-RFB-BNW

**STIPULATION AND ORDER TO MODIFY  
THE BRIEFING SCHEDULE REGARDING  
DEFENDANTS' MOTIONS FOR  
SUMMARY JUDGMENT AND MOTION  
FOR SANCTIONS**

1 IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiffs and  
 2 Defendants, through their respective attorneys of record, that the briefing schedule  
 3 regarding Defendants' Motions for Summary Judgment and Motion for Sanctions  
 4 (Doc. #s 68, 70 and 77) be modified to extend the deadlines for oppositions and  
 5 replies.

6 All other dates set by the Court would remain in effect. Good cause exists to  
 7 extend the deadlines for Plaintiffs' oppositions based on the voluminous evidentiary  
 8 record for the motions. The exhibits for the three motions collectively exceed 3,000  
 9 pages. Good cause likewise exists to extend the deadlines for Defendants' replies  
 10 based on the anticipated size of the evidentiary record for the oppositions.

11 WHEREAS, the parties agree that an extension would not be prejudicial to  
 12 either side. Such request, if granted, would result in the following schedule:

- 13 1. The deadline for the Opposition to LVMPD's Motion for Summary  
 14 Judgment (Dkt. 68) shall be extended from July 6, 2022, to July 27,  
 15 2022. The deadline for the Reply shall be extended from July 20, 2022,  
 16 to August 24, 2022.
- 17 2. The deadline for the Opposition to Defendant John Squeo's Motion for  
 18 Summary Judgment (Dkt. 70) shall be extended from July 6, 2022, to  
 19 July 27, 2022. The deadline for the Reply shall be extended from July  
 20 20, 2022, to August 24, 2022.
- 21 3. The deadline for the Opposition to Defendant John Squeo's Motion for  
 22 Sanctions (Dkt. 77) shall be extended from June 29, 2022, to July 27,  
 23 2022. The deadline for the Reply shall be extended from July 6, 2022,  
 24 to August 24, 2022.

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1 All other pre-trial dates would remain in effect.

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3 Respectfully submitted,

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5 DATED: 06/16/2022

6  
7 **LAW OFFICES OF DALE K. GALIPO**

8  
9 s/ Eric Valenzuela

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15 **MARQUIS AURBACH COFFING**

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20 **MCNUTT LAW FIRM. P.C.**

21  
22 s/ Daniel R. McNutt


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26 *Counsel for Defendant Squeo*

Case No. 2:20-cv-01589-RFB-BNW

STIPULATION AND ORDER TO MODIFY  
THE BRIEFING SCHEDULE REGARDING  
DEFENDANTS' MOTIONS FOR  
ORDER SUMMARY JUDGMENT AND MOTION  
FOR SANCTIONS

IT IS SO ORDERED

DATED this 20<sup>th</sup> day of June, 2022.

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**RICHARD E. BOULWARE, II**  
**United States District Court**